

EXHIBIT K

Videotaped Deposition of
Cole Loveall
PMK for Universal
March 23, 2023

Freeman

vs.

Deebs

Confidential



Confidential

Freeman vs.
Deebs

Cole Loveall

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3
4 LYNNE FREEMAN, an
5 individual,
6 Plaintiff,
7 vs. No. 1:22-cv-02435-LLS
8 TRACY DEEBS-ELKENANEY P/K/A
9 TRACY WOLFF, an individual;
10 et al.,
11 Defendants.

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14 CONFIDENTIAL
15 VIDEO DEPOSITION OF COLE LOVEALL
16 AS PMK FOR UNIVERSAL
17 Reported Remotely through Videoconference
18 March 23, 2023
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23 Reported by:
24 Margaret A. Smith
RPR, CRR, CSR No. 9733
25 Job No.: 10115790

Confidential

Freeman vs.
Deebs

Cole Loveall

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3

4 LYNNE FREEMAN, an
5 individual,

6 Plaintiff,

7 vs.

No. 1:22-cv-02435-LLS

8 TRACY DEEBS-ELKENANEY P/K/A

9 TRACY WOLFF, an individual;

10 et al.,

11 Defendants.
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21 Deposition of COLE LOVEALL taken on behalf of
22 Plaintiff, reported remotely through videoconference,
23 beginning at 1:09 p.m. PST, and ending at 2:27 p.m. PST,
24 on Thursday, March 23, 2023, before Margaret A. Smith,
25 RPR, CRR, Certified Shorthand Reporter No. 9733.

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Freeman vs.
Deebs

Cole Loveall

1 APPEARANCES (via videoconference):

2

3 FOR PLAINTIFF:

4 CSREEDER, PC

5 BY: MARK PASSIN, ESQUIRE

6 11766 Wilshire Boulevard, Suite 1470

7 Los Angeles, California 90025

8 310.861.2470

9 mark@csrlawyers.com

10

11 FOR DEFENDANTS TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF;

12 ENTANGLED PUBLISHING, LLC; HOLTZBRINCK PUBLISHER, LLC,

13 D/B/A MACMILLAN; UNIVERSAL CITY STUDIOS, LLC:

14 COWAN, DEBAETS, ABRAHAMS & SHEPPARD LLP

15 BY: BENJAMIN HALPERIN, ESQUIRE

16 BY: CECE COLE, ESQUIRE

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18 Beverly Hills, California 90212

19 310.492.4392

20 bhalperin@cdas.com

21 ccole@cdas.com

22

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**Freeman vs.
Deebs**

Cole Loveall

1 APPEARANCES (via videoconference):

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3 Also present:

4 Spencer Benveniste, Aptus videographer

5 Emily Birdwhistell

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Freeman vs.
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Cole Loveall

1 relationship is.

2 Q Okay. You can put that exhibit down.

3 I would like to show you what's been previously
4 marked as Exhibit 58, which is a literary option
5 purchase agreement between Universal Pictures and
6 Entangled Publishing, LLC, and a cover letter and check.

7 Would the videographer please post that in the
8 chat room. That's previously Exhibit 58.

9 BY MR. PASSIN:

10 Q Let me know when you have the document and
11 you're ready to proceed.

12 A Okay.

13 Q Please turn to Bates No. page Universal 000003.
14 And tell me, please, what this agreement is.

15 A It's a literary option purchase agreement.

16 Q Between whom?

17 A Entangled Publishing, LLC, and Universal
18 Pictures, a division of Universal City Studios, LLC.

19 Q And for what property is it for?

20 A Crave, a book written by Tracy Deeks-Elkenaney,
21 PK Tracy Wolff, including -- I can read the rest if you
22 need me to.

23 Q Go ahead.

24 A Okay. [REDACTED]

25 [REDACTED]

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Freeman vs.
Deebs

Cole Loveall

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Q Okay. In your own words, basically, what's your understanding of what rights Universal acquired pursuant to this agreement?

A Can you scroll down.

Page -- sorry. Let me find it. Page 0000014. Section 4, at the same time rights. It says in the third sentence, [REDACTED]

Q All right. And did you negotiate this agreement?

A I did.

Q And you negotiated it on behalf of Universal?

A To be clear, I negotiated the business points on behalf of Universal.

Q As opposed to what other points?

A Legal points.

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Freeman vs.
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MR. HALPERIN: Objection. Calls for a legal conclusion. Objection to form. Objection. Asked and answered.

THE WITNESS:

MR. PASSIN: We can take a five-minute break now. I may be done too. I just want to look at --

MR. HALPERIN: Okay.

VIDEOGRAPHER: The time is 2:13 p.m. We are off the record.

(Recess from 2:13 p.m. to 2:25 p.m.)

VIDEOGRAPHER: Okay. Back on the record. The time is 2:25 p.m. extra.

BY MR. PASSIN:

Q Do you know anything about the development and writing of the book Crave?

MR. HALPERIN: Objection to the form.

THE WITNESS: No.

MR. PASSIN: I have no further questions.

MS. COLE: CeCe, before we go off the record,

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Deebs

Cole Loveall

1 I, the undersigned, a Certified Shorthand Reporter of
2 the State of California, do hereby certify:

3 That the foregoing proceedings were taken before me
4 at the time and place herein set forth; that any
5 witnesses in the foregoing proceedings, prior to
6 testifying, were duly sworn; that a record of the
7 proceedings was made by me using machine shorthand,
8 which was thereafter transcribed under my direction;
9 that the foregoing transcript is a true record of the
10 testimony given.

11 Further, that if the foregoing pertains to the
12 original transcript of a deposition in a federal case,
13 before completion of the proceedings, review of the
14 transcript (X) was () was not requested.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or party to this action.

18 IN WITNESS WHEREOF, I have this date subscribed
19 by name.

20 Dated: 4/4/2023



21
22
23 Margaret A. Smith

24 RPR, CRR, CSR No. 9733
25

Cole Loveall

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Freeman vs.
Deebs

DECLARATION UNDER PENALTY OF PERJURY

Case Name: Freeman vs. Deebs

Date of Deposition: 03/23/2023

Job No.: 10115790

I, COLE LOVEALL, hereby certify
under penalty of perjury under the laws of the State of
CALIFORNIA that the foregoing is true and correct.

Executed this 2ND day of
MAY, 2023, at 4:20 PM.



COLE LOVEALL

NOTARIZATION (If Required)

State of _____

County of _____

Subscribed and sworn to (or affirmed) before me on
this _____ day of _____, 20____,

by _____, proved to me on the
basis of satisfactory evidence to be the person
who appeared before me.

Signature: _____ (Seal)